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MONTANA OFFICE

Site East Helena
File # 1.10.07.00 and 2.04
Confidential: Yes ☐ No ☒
Admin. Record: Yes ☒ No ☐
Key Words/Comments: Comments from
ARCO Coal concerning Proposed
Plan for Process Ponds.

FAX to ICF ✓
Copy to DHES ✓
to CH2 ✓

September 20, 1989

Mr. D. Scott Brown
Remedial Project Manager
U.S. Environmental Protection Agency
Montana Operations Office
301 South Park
Helena, Montana 59626

Re: Comments on Proposed Plan for the East Helena
Smelter Site

Dear Mr. Brown:

These comments on the Proposed Plan for the East Helena Smelter Site (the "Proposed Plan") are submitted on behalf of the Atlantic Richfield Company ("ARCO"). As indicated in the attached request for an extension of the public comment period which was hand-delivered to Sandra Moreno (EPA Region VIII - Office of Regional Counsel) earlier today, ARCO has had only three working days to review the remedial investigation/feasibility study ("RI/FS") report for the Process Ponds Operable Unit. Additional time is required in order for ARCO to comment in a meaningful manner on the RI/FS and the Proposed Plan.

Since Ms. Moreno indicated in our telephone conversation on September 18, 1989 that the Agency may be unwilling to grant an extension of the public comment period, ARCO is providing the following preliminary comments to the Agency. By providing these comments, ARCO does not admit or concede that it is a responsible party at the East Helena Smelter Site. ARCO does not waive and reserves its right to provide additional comments on the Proposed Plan and the RI/FS.

1. The Preferred Alternative for Lower Lake Should Include In-Place Treatment of Water in Lower Lake. The Proposed Plan provides that,

In-place treatment of water in Lower Lake may be a promising alternative to discharging pretreated water into Prickly Pear Creek or the POTW. Small-scale lab tests have been

successful. If ASARCO can demonstrate success on a larger scale, and if prescribed state and federal standards can be achieved, this alternative should be reevaluated.

Proposed Plan, p. 5. Given the success of lab tests, ARCO encourages the Agency to give serious consideration to in-place treatment of water in Lower Lake as a component of the remedial action selected for Lower Lake.

2. The Preferred Alternative for Lower Lake Should Not Include the Removal of an Additional Two Feet of Material Below the Sludge and Sediment Layer. The Preferred Alternative for Lower Lake calls for the excavation of "an additional two feet below the artificially deposited sediment and sludge layer." The Proposed Plan states that such excavation "provides a margin of safety and it offers greater assurance that Lower Lake water, once treated, will meet federal drinking water standards after coming into contact with the sediments." Proposed Plan, p. 5.

The Agency has provided no technical basis for its conclusion that excavation of an additional two feet will provide a greater margin of safety. In fact, the Proposed Plan indicates that leachate from soil leach tests meets federal drinking water standards for sediments found at the lower limit of the artificially deposited layer without excavation of an additional two feet. ARCO does not believe that requiring the removal of an additional two feet of material can be technically or legally justified. Therefore, such removal should not be a component of the remedial action selected for Lower Lake.

3. Deep Excavation of Soils and Sediments in the Area of the Acid Plant Water Treatment Facility and the Speiss Pond and Pit Should Not Be Required. The RI/FS report evaluated removing the upper five feet of sediment in the area of the Acid Plant Water Treatment Facility and capping the surface to prevent downward migration of water through underlying sediments. The RI/FS report also considered excavation of the upper six feet of sediments underlying the Speiss Granulating Pit and Pond. EPA's Proposed Plan, on the other hand, recommends the removal of up to 20 feet of soils in these areas, if practical. Such deep excavation will create a large amount of additional soils and sediments requiring smelting without producing any significant environmental benefits.

With respect to the Speiss Granulating Pit and Pond, the Proposed Plan acknowledges that "soil excavation depth, as determined by soil leach tests, would be approximately six feet." The only justification the Agency provides for additional excavation of contaminated soils is that "new structures would have to be moved or disassembled" if the Agency determines at some later date that further excavation should have been performed. Proposed Plan, p. 6. With respect to the Acid Plant Water Treatment Facility area, capping of the surface would appear to eliminate percolation of water through the soils. Thus, no mechanism for mobilization of metals in soils underlying the Acid Plant Water

Treatment Facility area would exist. ARCO does not believe that the Agency has provided a rational basis in support of deep excavation. Therefore, deep excavation should not be included as a component of the remedial action selected for the Speiss Granulating Pit and Pond and the Acid Plant Water Treatment Facility areas.

Thank you for your consideration of these preliminary comments. Please include these comments in the administrative record for the East Helena Smelter Site.

Sincerely,



Robert W. Lawrence

cc: Sandra R. Moreno, Esq.
Jeffrey H. Desautels, Esq.
Robert L. Dent